

Daniel Johnson Jr. (Bar No. 57409)
Mario Moore (Bar No. 231644)
DAN JOHNSON LAW GROUP, LLP
400 Oyster Point Blvd., Suite 321
South San Francisco, CA 94080
Telephone: (415)604-4500
dan@danjohnsonlawgroup.com
mario@danjohnsonlawgroup.com

Harold V. Johnson (IL Bar No. 6188149)
BRINKS GILSON & LIONE
455 N. Cityfront Plaza Drive, Suite 3600
Chicago, IL 60611
Telephone: (312) 321-4200
hjohnson@brinksgilson.com
Appearance *pro hac vice*

Lyle B. Vander Schaaf (DC Bar No. 422380)
Fei Hu (DC Bar No. 1016150)
BRINKS GILSON & LIONE
1775 Pennsylvania Ave, NW, Suite 900
Washington, DC 20006
Telephone: (202) 296-8700
lvanderschaaf@brinksgilson.com
echristou@brinksgilson.com
fhu@brinksgilson.com
Appearance *pro hac vice*

Attorneys for Specially Appearing Defendant
Fujian Jinhua Integrated Circuit Co., Ltd.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MICRON TECHNOLOGY, INC.,

Plaintiff,

v.

UNITED MICROELECTRONICS
CORPORATION, FUJIAN JINHUA
INTEGRATED CIRCUIT CO.,
LTD., and DOES 1-10

Defendants.

Case No. 3:17-cv-6932-MMC

**DECLARATION OF YUCHENG TUNG IN
SUPPORT OF DEFENDANT FUJIAN JINHUA
INTEGRATED CIRCUIT CO., LTD.'S
OPPOSITION TO PLAINTIFF MICRON
TECHNOLOGY, INC.'S MOTION TO LIFT
STAY**

Judge: Honorable Maxine M. Chesney
Courtroom: 07, 19th Floor
(Proposed) Hearing Date: 1/8/2021
(Proposed) Hearing Time: 09:00 AM

I, Yucheng Tung, hereby declare as follows:

2. I am a Patent Manager of Defendant Fujian Jinhua Integrated Circuit Co., Ltd. (“Jinhua”). I offer this Declaration in support of Jinhua’s Opposition to Plaintiff Micron Technology, Inc.’s (“Micron”) motion to lift stay.

3. I am responsible for overseeing all patent application filings resulting from the collaboration of United Microelectronics Corporation (UMC) and Jinhua.

4. I have reviewed the records relating to all United States patent applications jointly assigned to Jinhua and UMC that published after May 23, 2019.

5. All U.S. patent applications assigned to UMC and Jinhua that published after May 23, 2019 claim priority to either a Chinese parent patent application or a U.S. parent patent application (“Parent Applications”).

6. All of the parent patent applications were filed on or before October 11, 2018.

7. None of the published U.S. patent applications assigned to UMC and Jinhua after May 23, 2019 is a continuation-in-part of the Parent Applications. Accordingly, no new matter has been added.

I declare under penalty of perjury under 28 U.S.C. § 1746 and the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 18th day of December, 2020 in Jinjiang City, Fujian, China.


Yucheng Tung